

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

Richard Sposato, a.k.a. Richard-Louis: Sposato,)
)
)
 Plaintiff,)
 v.)
)
 Matthew W. Ryan, individually and in his official)
 capacity,)
 Defendant.)

Civil Case No.: 5:23-cv-364
(Judges Initials) GTS / MJK

FIRST INTERROGATORIES

PLAINTIFF INTERROGATORIES

Plaintiff, requests that, defendant Matthew W. Ryan, responds by answer through its counsel Paul V. Mullin, to the following interrogatories. You are required to answer these interrogatories separately and fully in writing, under oath. You are required to respond to these interrogatories no later than (30) thirty calendar days after receipt of these interrogatories, to the undersigned Plaintiff at his listed address herein.

INSTRUCTIONS

A. Each Interrogatory is to be answered fully on the basis of information which is known to you, and/or in your possession.

B. In each of your answers to these Interrogatories, you are requested to provide not only such information as is in your possession, but also information as is reasonable available. In the event that you are able to provide only part of the information called for by any particular Interrogatory, please provide all the information you are able to provide and state the reason for your inability to provide the remainder.

C. If you object to or otherwise decline to answer any portion of an Interrogatory, please provide all information called for by that portion of the Interrogatory to which you do not object or to which you do not decline to answer. For those portions of an Interrogatory to which you object or to which you do decline to answer, please state the reason for such objection or declination.

D. Every Interrogatory herein shall be deemed a continuing interrogatory and information in addition to or in any way inconsistent with your initial answer to such Interrogatory, will be deemed an insufficient, or non response.

E. If any of the following Interrogatories can be answered fully and completely simply by referring to an exhibit number, page, and paragraph of any document filed into this case, such references, if adequately identified to inform the Plaintiff as to your response will serve as a satisfactorily response to such Interrogatory.

**DEFINITIONS ACKNOWLEDGED FOR THE PURPOSE OF SPOSATO'S
COMPLAINT**

(i). "Motor vehicle" means every description of carriage or other contrivance propelled or drawn by mechanical power AND USED FOR COMMERCIAL PURPOSES [emphasis added] on the highways in the transportation of passengers, passengers and property, or property or cargo. [18 U.S. Code, Part 1, Chapter 2, Aircraft and Motor Vehicles, Definitions - §31(6)]

(ii). "State" means District of Columbia [NY VAT §516]

(iii). "United States" (A) a Federal corporation; (B) an agency, department, commission, board, or other entity of the United States; or (C) an instrumentality of the United States. [28 U.S. Code §3002 - Definitions]

(iv). Location of United States - The United States is located in the District of Columbia. [UCC 9-307(h)]

COMPLAINANT'S INTERROGATORIES

1. Please explain why, or why not, you agree with each of the above definitions listed in (i) - (iv)..?

2. Please explain why yes, or why no, STATE OF NEW YORK is or is not a corporation located in the UNITED STATES..?

a. What law, statute, code or contract makes "a man", i.e. Plaintiff in this case, obligated to follow either STATE OF NEW YORK or UNITED STATES corporate codes and statutes..?

3. Please explain why contracts are, or are not VOID for non full disclosure, supporting your position with law, statutes, codes, or jurisprudence..?
4. In all your years as a Solvay cop, how many times have you discharged your assigned pistol and taser gun, listing the dates for each discharge..?
 - a. What were the initial crimes being committed or suspected being committed, as per the call to action for each of those instances..?
5. Please explain why, or why not the North Orchard Rd. area is a high crime section compared to other areas in the Village of Solvay..?
6. Why do they put street lights on roads, such as I-690, W. Genesee St., and others..?
7. If a road has street lights, such as W. Genesee St. in front of Westvale Plaza, please explain why it would be highly possible, or why it would not be possible to see a car at night on the road from a distance of 50 yards..?
8. What was the initial reason you pulled out from your stake out position at Patrick's Dry Cleaners and followed Plaintiff traveling in his maroon Honda Accord, used automobile..?
9. At 2:15 in the morning in the Village of Solvay, on the roads of W. Genesee St. and N. Orchard Rd., on a scale of 0-10, with 0 being no cars on the road and 10 being the roads are congested with cars, how would you rate the situation at this time on each road..?
10. Why, at what point did you deploy your emergency lights in an attempt to stop[arrest] Plaintiff in his used automobile, stating the emergency..?

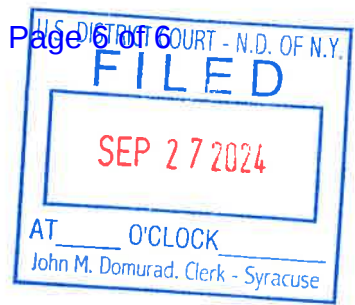
11. Are Solvay cops required to wear body camera's during their shift on duty and turn them on during an interaction with a suspect, going to a call and/or during a stop[arrest attempt]..?
 - a. Why weren't body cameras turned on in this instance with Plaintiff, on the morning of June 19, 2021..?
12. Please explain in detail, what crime Plaintiff committed or was suspected of committing, which was a an emergency situation and/or a threat to the public or yourself on the morning of June 19, 2021, necessitating you to discharge your taser gun's bullet into the midsection of Sposato's lower back..?
13. Approximately how many backup cars and total policemen do you recall were on the premises or in front of 510 N. Orchard Rd. during this altercation at 2:15 in the morning..?
14. In your experience as a Solvay cop, how many times has ALL the charges pertaining to one of your stops been completely dismissed..?
15. In your opinion, would you say the traffic charges you claimed Plaintiff violated are fairly cut and dry and/or easy to prosecute, i.e. driving without a license/aggravated unlicensed operation, no insurance, no registration, etc..?
16. What are your thoughts as to why all the charges you filed against Plaintiff on the morning of June 19, 2021 have been completely dismissed..?
17. If a businessman was charged with multiple crimes and/or offenses, i.e. 50+, was brought into court 20 times, almost once every month over a 2 1/2 yr. timeframe, then having all charges dismissed, in your opinion, please explain why that

person, his reputation and/or his business would not have been damaged in some capacity..?

Dated: September 27, 2024

All Rights Reserved,

By: 
Richard Sposato, Sui Juris
c/o 510 N. Orchard Rd.
Solvay, New York [13209]
Tel: 315-412-1776
Email: richie@nusoundmusic.com



STATE OF NEW YORK)

ss.

COUNTY OF ONONDAGA)

Affirmation of Service

On this 27th day of September, 2024, I, Richard-Louis: Sposato, along with this Affirmation of Service, served a true and correct copy of the within **First Interrogatories**, enclosed in a properly addressed white wrapper, postage fully prepaid, under the exclusive care and custody of the United States Postal Service, on the following attorney for Matthew Ryan:

Sugarman Law Firm, LLP
Attn: Paul V. Mullin
211 W. Jefferson St., Suite 20
Syracuse, NY 13202

USPS Certified Return Receipt #9589 0710 5270 2108 6487 54

I, Richard-Louis: Sposato, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


Richard-Louis: Sposato